
Subject: Vendor Monitoring

Effective Date: October 1, 2014

Revised from: October 1, 2010

Policy: Local Agency (LA) staff will monitor authorized vendors by August 1st of each contract year to ensure compliance with program requirements and serve as a support resource. A monitoring visit shall include but is not limited to:

- ensuring minimum stock of WIC approved food items
- price verification
- education about WIC Program requirements
- WIC transaction issues
- any needed corrective actions that must be taken to assure compliance with program policies and procedures and proper reimbursement for WIC checks.

LA staff will need the [Vendor Monitoring Form](#) and the [WIC Product Inventory Form](#) for each monitoring visit conducted.

Reference: 7 CFR § 246.12(j)

Procedure:

1. The State Agency (SA) will ensure that LA staff completes on-site monitoring visits of authorized WIC vendors. Authorized vendors will be selected for monitoring visits based on the following factors:
 - a. At least five percent (5%) of vendors that have been determined by the SA as high risk will receive a prioritized high-risk compliance investigation. These vendors will be flagged and the LA will be notified not to conduct a monitoring visit during the investigation period.
 - b. Vendors that have been determined as high risk and were not selected for the prioritized high-risk compliance investigations will have a minimum of one (1) on-site monitoring visit within 12 months from the date the vendor is flagged as a high-risk vendor.
 - c. LA's not in their vendor contract renewal year will select a representative sample of all other vendors under the LA's management. A total of 10% of the vendors under the LA's management shall have an on-site monitoring visit completed during the Federal Fiscal Year, unless otherwise directed by the SA.
 - d. LA's in their vendor contract renewal year will complete on-site monitoring on all of the vendors under the LA's management. A total of 100% of the vendors under the LA's management shall have an on-site monitoring visit completed during the contract renewal year.
2. On-site monitoring visits may be unannounced.

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3. The LA serving the area where the vendor is located will be responsible for on-site monitoring and follow-up of that vendor, unless otherwise arranged with the SA.
4. All on-site monitoring visits will be documented by use of the Vendor Monitoring Form in accordance with instructions developed by the SA.
5. The SA Vendor Manager will exclusively handle the assignment of violations, sanctions and fines, including Civil Money Penalties. During on-site visits, the LA will provide technical assistance for observed and documented program violations.
6. LA staff shall complete the Vendor Monitoring Form for every on-site monitoring visit conducted.
7. When arriving at a vendor location to conduct a monitoring visit, the LA staff should request the following:
 - a. to speak with the store owner/manager or representative.
 - b. inform the store owner/manager or representative that an on-site monitoring visit will include a minimum stock requirement assessment.
 - c. extend an invitation to the store owner/manager or representative to accompany him/her on the minimum stock requirement assessment. The store owner/manager or representative is not required to accompany the LA staff when the minimum stock requirement assessment is being completed.
 - d. results from the minimum stock assessment and monitoring visit should be reviewed with the store owner/manager or representative at the conclusion of the on-site visit.
8. Specific non-compliance issues shall be addressed during the on-site review. Any follow-up corrective action should be documented on the Vendor Monitoring Form. All noteworthy observations and follow-up actions should be noted in the comment section of the Vendor Monitoring Form. These issues should be discussed with the store owner/manager or representative when feasible.
9. All actions pertaining to the vendor monitoring visit shall be entered in the KWIC system.
10. Send the original Vendor Monitoring form and WIC Product Inventory form to the SA and retain a copy in the LA vendor file.